

Print Name: STEVEN CURTIS LEECH
SID #:13345628
S.R.C.I.
777 Stanton Blvd.
Ontario, OR. 97914

IN THE UNITED STATES DISTRICT COURT
FOR THE STATE OF OREGON
PORTLAND DIVISION

STEVEN CURTIS LEECH,)	
)	
Plaintiff,)	Civil Action No. 2:23-cv-00794-AN
)	
v.)	MOTION TO COMPEL
)	
GARCIA et al.,)	
)	
Defendant.)	LR 33-3
_____)	

1.

COMES NOW, the Plaintiff, STEVEN CURTIS LEECH Pro Se, and hereby petitions this court to compel the production of all papers, pictures, and all evidence in possession of the defense, disclosing the following, but not limited to materials and information within its possession or control, or which may at any time hereafter come into its possession or control before the time of the trial in this case. Plaintiff has requested all this and the defense has failed to produce and it has been more than 30 days since the plaintiff's last request. All video footage for said incident. As well as all Unusual Incident Reports (UIR's) relating to the incident. Also, the plaintiff requests

any record of prior disciplinary actions against any of the defendants or any official reprimands in their employment file.

2.

The names, addresses and dates of birth of the persons intended to be called as witnesses at any stage of the trial, together with all written or recorded statements or memorandum of oral statements of such persons, including all records in its possession.

- 1) Any written or recorded statements or memorandum of any oral statements made by the defendant, or made by a co-defendant (if any).

3.

- 1) Any record of compliance with D.O.C. policy 40.1.14 on use of force on a MH3 inmate. The name of the BHS/QMHP consulted and their recommendation. As well as whether they were present or not.

4.

As for interrogatory questions I request that Sgt. Garcia answer the following questions;

- A.) Please state your Name, occupation, and place of employment.
- B.) Describe the incident that occurred March 18th 2022, involving Steven Leech in your own words.
- C.) Who tackled Mr. Leech?
- D.) Who struck Mr. Leech with or without a closed fist?
- E.) Who held down Mr. Leech?
- F.) Who restrained Mr. Leech?
- G.) What was Mr. Leech wearing?
- H.) Was it possible that Mr. Leech could have been concealing weapons on his person?
- I.) Please describe how Mr. Leech posed a threat to you personally if at all?
- J.) Who was your supervisor at the time of the incident?
- K.) Were you aware that Mr. Leech was supposed to be restrained with extended cuffs?
- L.) Who handcuffed Mr. Leech and if so did they use extended cuffs?
- M.) Who recorded the incident on the handheld camcorder?

- N.) Was a BHS provider present and if so who?
- O.) How many times was Mr. Leech struck? Where was he struck, and by whom?
- P.) What was C.O. J. Hunter's involvement?
- Q.) What was C.O. C. Houle's involvement?
- R.) What was C.O. S. Main's involvement?
- S.) What was C.O. J. Marasa's involvement?
- T.) What was C.O. H. Moran's involvement?

5.

1.) The plaintiff is entitled to discovery, and the proceeding requested documents, video and interrogatory questions are vital to the preparation of the plaintiff's case. Without these things the plaintiff cannot properly prepare or argue his case. These have been requested on more than one occasion by the plaintiff. It has been more than 30 days since my last request and I have received no response. It is not possible to prepare or effectively argue my case without this evidence.

Dated this day May 8, 2024

Respectfully Submitted,



(Signature)

Print Name: STEVEN CURTIS LEECH

Sid #: 13345628

S.R.C.I.

777 Stanton Blvd.

Ontario, OR. 97914

CERTIFICATE OF SERVICE

CASE NAME: LEECH v GARCIA et al

CASE NUMBER: 2:23-cv-00794-AN

COMES NOW, STEVEN CURTIS LEECH, and certifies the following:

That I am incarcerated by the Oregon Department of Corrections at SNAKE RIVER CORRECTIONAL INSTITUTION

That on the 8 day Of May 2024, I personally E-filed
A TRUE COPY of the following:

Motion for appointment of counsel, Motion to compel

I E-filed through Snake River Correctional Institution's legal library, to the person(s)
named at the places addressed below:

UNITED STATES DISTRICT COURT OF OREGON, PORTLAND DIVISION.

(Signature)



Print Name STEVEN CURTIS LEECH

S.I.D. No.: 13345628

S.R.C.I.

777 STANTON BLVD

ONTARIO, OR. 97914